

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
KALEB COLE,  
Defendant.

NO. CR20-032JCC

**GOVERNMENT'S MOTION TO SEAL  
SUPPLEMENTAL VICTIM IMPACT  
STATEMENT**

**NOTE ON MOTION CALENDAR:  
June 5, 2020**

The United States, by and through Brian T. Moran, United States Attorney for the Western District of Washington, and Thomas Woods, Assistant United States Attorney for said District, respectfully moves to seal Exhibit D to the Government's Opposition to the Defendant's Motion to Reopen Detention. Exhibit D consists of a supplemental victim impact statement. The statements should be sealed to avoid the possibility that individuals associated with the group that perpetrated the scheme in this case would further harass, intimidate, or harm the victim.

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1 Dated this 4th day of June 2020.  
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3 Respectfully submitted,  
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5 BRIAN T. MORAN  
6 United States Attorney

7 s/ Thomas M. Woods  
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9 Assistant United States Attorney  
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